



**American Association
of Airport Executives/
Airports Research and
Development
Foundation**

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February 18, 2005

Ms. Debbie Irvin, Clerk to the Board
Executive Office
State Water Resources Control Board
1001 I Street, 24th Floor [95814]
P.O. Box 100
Sacramento, CA 95812-0100

**RE: AAAE/ARDF Comments on the Draft Industrial General Permit
(2004 Draft Permit)**

Dear Ms. Irvin:

On behalf of the American Association of Airport Executives/Airports Research and Development Foundation (AAAE/ARDF), thank you for the opportunity to provide comments regarding the renewal of the current General Permit for Storm Water Discharges Associated with Industrial Activities. AAAE/ARDF has been working with staff over the last several years to develop recommendations for the renewal of the current General Permit. AAAE/ARDF previously provided comments on the revision of the 1997 General Permit in June of 2003. We also appreciated the opportunity to testify at the Sacramento Hearings and for the additional time granted by the Board for filing of these comments.

The American Association of Airport Executives (AAAE) is a not-for-profit professional organization representing airport management personnel around the world. Founded in 1928, AAAE represents airport executives and personnel at over 600 U.S. airports, including most airports in the State of California. A separate, not-for-profit technical organization, the Airport Research and Development Foundation (ARDF), provides research, technical and data support for AAAE/ARDF projects.

AAAE/ARDF has organized a California Monitoring Group since 1992, the inaugural year of the California General Industrial Stormwater Permit. The Group has evolved in the past 11 years and credits the State's Group Monitoring Program with fostering an effective way for the aviation industry to develop an effective stormwater compliance program through shared resources and industry leadership. The Group is concerned with a number of the provisions in the new draft industrial stormwater permit and it offers several significant comments that will improve the group monitoring program while maintaining the original mission of group

SPECIAL HEARING

2/3/05

CC: BD, DI, DNQ

E-CYS: BD, CC, HMS, TH, CMW

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airport executives